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| 8 | UNITED STATES DA | NKDHDTCV COHDT | |
| 9 | UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA | | |
| 10 | SAN FRANCIS | SCO DIVISION | |
| 11 | In re: | Bankruptcy Case No. 19-30088 (DM) | |
| 12 | PG&E CORPORATION, | Chapter 11 | |
| 13 | - and - | (Lead Case) (Jointly Administered) | |
| 14 | PACIFIC GAS AND ELECTRIC | | |
| 15 | COMPANY, | REORGANIZED DEBTORS' REPORT ON RESPONSES TO ONE HUNDRED FOURTEENTH OMNIBUS OBJECTION TO | |
| 16 | Debtors. | CLAIMS AND REQUEST FOR ORDER BY DEFAULT AS TO UNOPPOSED | |
| 17 | ☐ Affects PG&E Corporation ☐ Affects Pacific Gas and Electric Company | OBJECTIONS OR OTHER DEPARTMENT OF THE PROPERTY | |
| 18 | Affects Facilite Gas and Electric Company Affects both Debtors | [Re: Dkt. No. 11849] | |
| 19 | * All papers shall be filed in the Lead Case, No. 19-30088 (DM). | Regarding Objections Set for Hearing March 2, 2022, at 10:00 a.m. (Pacific Time) | |
| 20 | 17-30000 (DIN). | Watch 2, 2022, at 10.00 a.m. (1 acme 1 mie) | |
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Case: 19-30088 Doc# 11966 Filed: 02/23/22 Entered: 02/23/22 18:11:10 Page 1 of 3

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation ("PG&E Corp.") and Pacific Gas and Electric Company (the "Utility"), as debtors and reorganized debtors (collectively, the "Debtors" or the "Reorganized Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the Second Amended Order Implementing Certain Notice and Case Management Procedures, entered on May 14, 2019 [Dkt No. 1996] ("Case Management Order"), that the Court enter an order by default on the following omnibus claims objection (the "Omnibus Objection"):

| Docket Number | Omnibus Objection |
|----------------------|---|
| 11849 | Reorganized Debtors' One Hundred Fourteenth Omnibus Objection to Claims (Passthrough Claims / Amended and Superseded Claims) (the "One Hundred Fourteenth Omnibus Objection") |

RELIEF REQUESTED IN THE OMNIBUS OBJECTION

The Omnibus Objection seeks to disallow and expunge the Proofs of Claim listed in Exhibit 1 and Exhibit 2 to the Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection [Docket No. 11851]. The Omnibus Objection was also supported by the declaration of Robb McWilliams [Docket No. 11850]. The Omnibus Objection, the Notice of Hearing, and the Declarations were served as described in the *Certificate of Service of Sonia Akter*, filed on January 27, 2022 [Docket No. 11873]. Each holder of a claim listed on Exhibits 1 and 2 to the Omnibus Objection received a notice customized to include the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Omnibus Objection has passed. The Reorganized Debtors did not receive any formal or informal responses.

Case: 19-30088 Doc# 11966 Filed: 02/23/22 Entered: 02/23/22 18:11:10 Page 2

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- 1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors.
- 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objection except as described herein.
 - 3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and expunging the Proofs of Claim listed in <u>Exhibit 1</u> and <u>Exhibit 2</u> to this Request, which listed Claims are identical to those listed in Exhibits 1 and 2 to the Omnibus Objection.

Dated: February 23, 2022

KELLER BENVENUTTI KIM LLP

By: <u>/s/ Dara L. Silveira</u>
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors

Case: 19-30088 Doc# 11966 Filed: 02/23/22 Entered: 02/23/22 18:11:10 Page 3